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May 3, 2024

VIA ECF

Hon. Judge Robyn F. Tarnofsky
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: Michael Odam v. ELRAC, LLC et al.
Case No. 1:24-cv-02017-LAK**

Dear Judge Tarnofsky:

We represent Defendants ELRAC, LLC, Alamo Rental (US) LLC, and National Rental (US) LLC (collectively, “Defendants”) in the above-referenced action. The parties requested to participate in the Court’s Mediation Program, and the Court so-ordered the case to be referred to the Court’s Mediation Program on April 12, 2024. In an effort to conserve resources while the parties attempt to reach an early resolution of this action, Defendants, with Plaintiff’s consent, requested a stay on Defendants’ time to answer, move, or otherwise respond to the Complaint. On April 16, 2024, the Court granted Defendants’ request and provided that Defendants shall have until the earlier of 14 days after the first mediation session or June 15, 2024 to respond to the Complaint. (Dkt. 22.)

On March 29, 2024, prior to Defendants’ request for a stay on Defendants’ time to answer, move, or otherwise respond to the Complaint, the Court ordered the parties to file a proposed scheduling order and appear for an initial conference on May 8, 2024 at 10:30 AM. (Dkt. 18.) In an effort to conserve resources while the parties are participating in the Court’s Mediation Program with the hopes of resolving this matter, the parties are jointly requesting a stay on discovery, including the proposed scheduling order and the initial conference set for May 8, 2024.

This is the parties’ first request for a stay on discovery and such request would not affect any other deadlines.

Thank you for Your Honor’s consideration of this request.

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Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, PC

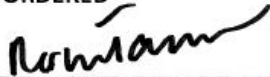
By: s/ Sarah M. Zucco

Sarah M. Zucco
Kelly M. Cardin

Application GRANTED. The Initial Case Management Conference
is adjourned until **June 20, 2024 at 10:00 AM.**

Dated: May 3, 2024
New York, NY

SO ORDERED



ROBYN F. TARNOFSKY
UNITED STATES MAGISTRATE JUDGE